

ATTACHMENT 12

BFIP's OPERATION PLAN

OPERATION PLAN

**SANITARY LANDFILL
(EXISTING 51.3± CUERDAS)**

PONCE, PUERTO RICO

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PONCE, PUERTO RICO

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1. Facility Name and Address

The facility name and address is:

Relleno Sanitario del Municipio de Ponce
Barrio La Cotorra
Baramaya Avenue
Ponce, Puerto Rico 00732
(809) 840-7732

The facility is located west of downtown Ponce on Route 500, at approximate latitude 18° 00' 33" and longitude 66° 39' 48".

2. Operator Name and Address

BFI of Ponce, Inc. (BFI) entered into a five year agreement with the City of Ponce to operate the landfill. The agreement commenced on March 1, 1987. The operator's name and address is:

BFI of Ponce, Inc.
Carr. #2 KM 225.5
Barrio El Tuque
Ponce, Puerto Rico 00732
(809) 848-7770

3. Existing Status of Facility

existing
This landfill operation plan applies to a 51.3± cuerdas tract within the confines of the Ponce Municipal Landfill property limits. This 51.3± cuerdas tract is operated under temporary permit issued by the Environmental Quality Board (EQB). The site, consisting of a valley ringed by mountains, has been used for waste disposal for 30 or more years.

4. Access Road and Access Control (Security)

All refuse hauling vehicles enter and leave the site through the main gate located in the southeastern area of the property. The 60-ton scale and gate house are located at this point and all incoming vehicles must check-in before proceeding to the active portion of the landfill.

On-site access roads will be constructed of soil and rock from on-site sources and will be graded to allow rapid drainage and reasonable grades for fully loaded refuse trucks. Access roads will be temporary and will be relocated in advance of moving the active disposal area. The site entrance road, which provides access to the weigh scales, landfill office and crew building, is asphalt-paved. This road is constructed with speed bumps to control speed and allow additional removal of mud before trucks leave the site. The speed limit within the site will be 24 Kph (15 mph).

Because of the relatively dry climate, mud is generally not a problem. Vehicles exiting the site will travel over speed bumps that will help in

removing mud that might accumulate on the tires. In addition, exiting vehicles will travel about 1/4 mile on asphalt road which will assist in on-site removal of mud, otherwise water hoses can be used. The roads are also maintained by a motor grader.

Unauthorized access is prevented by a 2.1 meter high chain link fence. The fence surrounds the entire site with the exception of two short stretches where the topography provides a natural barrier.

5. Personnel

The landfill will generally be operated by the following staff:

- 4 operators
- 1 manager
- 1 gatehouse keeper
- 1 laborer/spotter

A security service will be employed to guard the landfill during non-operational hours.

6. Hours of Operation

The Ponce Municipal Landfill will operate during the hours of 6:00 a.m. thru 6:00 p.m., Monday thru Friday, and 6:00 a.m. thru 2:00 p.m., Saturday. The landfill will be closed on Sundays.

7. Equipment

Equipment at the site will include:

- one Cat D8L dozer
- one Cat D8K dozer
- one Cat 120 motor grader
- one Mack DM dump truck
- one Cat 966 wheel loader
- one Mack 3000 gallon water truck
- other miscellaneous support equipment

Additional equipment needs will be supplied through rental on an as-needed basis.

Fuel storage and dispensing facilities available on-site will be locked and secured when not in use.

Lubricants, tools and small equipment will be stored in the storage bins provided on-site and the bins locked during non-operational hours.

8. Signs

Appropriate signs are present at the entrance presenting the rules of the landfill and the hours of operation. Other signs are present to control traffic and prohibit hazardous material disposal.

9. Site Facilities

Site facilities either existing or proposed are located near the entrance gate. *of vehicle one*

1. Gate House - Existing. Provides all weather enclosure for checker to evaluate incoming wastes, check weight, ~~handle~~ *handle* and provide directions.
2. Truck Scale - Existing. Allows determination of weight of refuse delivered to site.
3. Office Trailer - Existing. Office space plus restroom, and storage; first aid kit maintained here.
4. Maintenance Shop - Proposed.
5. Public Disposal Containers - Existing. Open top roll-off containers with a raised ramp access are provided near the entrance gate to provide disposal to small vehicles. This will reduce the traffic at the active fill area.

10. Aesthetics

The entrance will have a landscaped area with an attractive redwood sign identifying the site, and flags will be flown. The facilities are designed so as to provide an aesthetically pleasing appearance.

11. Sequence of Operation and Site Development

As collection vehicles enter the landfill they will be registered at the gate house. All vehicles will be recorded on a daily log identifying the truck volume, type of material, and time of entrance. The scale will be used on a periodic check basis to monitor the weight of the waste in the collection vehicles. After leaving the gate house, the trucks will proceed to the active disposal area and be directed to a specific unloading area by a spotter. The spotter's job will be to keep (1) the unloading sequence orderly and safe and (2) to keep the area as small as possible. After the truck has completed unloading it will immediately proceed to exit the site.

The waste will be spread in approximately 2 feet thick layers and compacted with a number of passes of the dozer. This will allow for the waste to be compacted into a volume that is as small as is practical. After the final load of the day has been compacted, earthen cover material will be pushed over the waste and compacted.

The fill and cover sequence is repeated on a daily basis in a progression of contiguous "cells". The cells combined together will form a terrace that is graded to promote positive drainage. A typical sectional overview of this area fill operation is presented on Exhibit 1.

Final top slopes will be 2-5% and final side slopes will be a maximum of 33%. These slopes will promote positive drainage and also allow for efficient use of the airspace.

12. Cover Material

Soil cover of wastes is used in three applications:

- 1.) 15 cm (6") daily cover
- 2.) 30 cm (12") intermediate cover
- 3.) 60 cm (24") final cover

Daily cover is applied at the end of each working day to provide control of insects and rodents, to prevent odor, blowing waste and fire and to provide a more pleasing appearance.

Intermediate cover is placed on areas that will not receive additional waste or final cover for 30 days or more.

Final cover is applied to areas which have received waste to the final design grade.

Intermediate or daily cover material will be taken from stockpiles adjacent to the working face or elsewhere on site, spread over the exposed waste, and compacted with the dozer. Cover soils will be obtained by excavation of the hills surrounding the landfill.

13. Solid Waste Types

A. General: The site will only accept a waste stream consisting of non-hazardous solid waste. The trucks will be inspected at the gate house upon entering the landfill to prevent disposal of unauthorized waste. If the waste is suspected of having hazardous properties, the nature of the waste will be verified prior to disposal.

Asbestos present
B. Tuna Sludge: Tuna sludge will be disposed at the site at a rate not to exceed 20 gallons per cubic yard of in place solid waste. The tuna sludge will be mixed at the active fill area with the solid waste in a manner so as to not create a trafficking problem. The area of disposal will be promptly covered with soil to minimize odors.

C. Asbestos: It is understood that asbestos waste is currently listed as a hazardous waste by EQB rules, but is being considered to be delisted in the very near future. No asbestos waste will be accepted for disposal unless it has received prior written approval by EQB and the City of Ponce's contractor laboratory. If the asbestos is friable then it would have to be packaged by (1) wetting the material and (2) placing in nonrupture bags (preferably double bagged) or in other tightly closed containers. Each bag will also contain warning labels identifying the contents.

The disposal of the asbestos will be in a trench excavated away from the active disposal area. This trench would be large enough to contain the entire load and the required 1.0 feet of cover material would be applied immediately after the asbestos has been placed in the trench.

- D. **Pharmaceutical:** Pharmaceutical waste will be disposed of in the same manner as asbestos.
- E. **Waste Water Treatment Sludge:** The City of Ponce waste water treatment sludge will be accepted for disposal with the solid waste. This waste water treatment sludge must go through primary digestion and drying beds prior to disposal at the landfill.
- F. **Junk Vehicles:** Only a small number of junk vehicles are brought to the landfill for disposal. Junk vehicles will not be abandoned on the landfill, but will be handled in a sound manner of disposal. Junk vehicles along with other bulky crushable items (such as appliances) will be crushed on a firm surface before being placed at the bottom of the active area and buried with other refuse. Pockets in the cell can also be prepared to handle such items. They will be covered with other refuse or soil prior to compaction.

14. Drainage

Ditches and other conveyance structures are present on site to promote drainage off and around the landfill area. These drainage features and the fill contours promote drainage away from the fill, prevent erosion, and eliminate ponding on the fill.

15. Salvaging and Scavenging

Salvaging and scavenging will not be permitted at the site. The site is fenced and the entrance is guarded to prevent unauthorized entry. Only those trucks unloading solid waste will be allowed at the active fill area.

16. Litter Control

The site consists of a valley ringed by mountains so the natural terrain and gentle breezes minimize the problem of blowing litter.

Litter control or control of windblown material will be achieved through employment of the following methods individually or any combination thereof necessary to effect the control:

1. deployment of daily cover
2. upwind deployment of cover stockpiles
3. downwind deployment of wind screening
4. Windblown or spilled waste material resulting from waste disposal operations or from collection vehicles entering or leaving the site will be collected by site personnel on a daily or as occurring basis.

17. Dust Control

We do not anticipate dust to be a problem; however, roads or cut areas not paved will be periodically wetted by a water truck to control dust. On site speed limits for collection vehicles will also assist in control of dust.

18. Vector Control

Well compacted wastes and cover material will be the most important factors in achieving vector control. Vectors will be restricted by employing at least 15 centimeters of compacted earth cover daily. Good compaction of the earth cover will also discourage rodent burrowing. Proper grading to prevent standing water and immediate disposal of tires will serve to retard mosquito occurrences. If vectors were to become a problem, a pesticide or extermination program will be developed.

19. Emergency Procedures and Response Plan

Emergency response procedures have been developed for the following types of extraordinary circumstances.

- fire
- personnel injury

An emergency coordinator has been selected. His name and address is:

- 1.) Mr. Richard Good, District Manager,
BFI of Ponce, Inc.

Home: Urb. Haciendas del Monte, D-5
Ponce, Puerto Rico 00732
(809) 848-3276

Site: Avenue Baramaya
Barrio La Cotorra
Ponce, Puerto Rico 00732
(809) 840-7732

The alternate emergency coordinator is Mr. Juan Rodríguez, Site Manager. These names will be prominently posted at the site. The emergency coordinators are familiar with all aspects of on-site activities emergency procedures and will have the authority to commit the resources necessary to respond to the emergency situation.

Off-site assistance is available from the Municipal Fire Department (El Tuque 809/842-4252), the Police-Department (809/343-2020) and the EQB (809/725-5140).

Communication is essential during any emergency and to this end, the site has both telephones and two way radio communication with many site

vehicles. A list of emergency telephone numbers will be posted in the landfill office. This list will include the following:

| | |
|--------------------------|--|
| Asilo de Damas Hospital | (809) 843-5151 (809) 843-2242 |
| San Lucas Hospital | (809) 840-4545 |
| Poison Control Center | (809) 754-8535 |
| El Tuque Fire Department | (809) 842-4252 |
| Civil Defense Department | (809) 842-0073 State (809) 843-2939 Municipal |

20. Explosive Gases

Appropriate and uniform sampling procedures will be used to field test for explosive gas with commercially available portable field equipment. The objectives of the program will be to insure that explosive gas is being properly monitored and dispersed. Monthly monitoring with a bar punch and probe will be performed at facility structures and along the property boundary. If explosive gases exceed those limits as outlined in Rule 304 G.1., a disbursement-vent type system will be engineered.

21. Fire Prevention and Control

In the event a fire ignited on-site (or an explosive event), all operations will be immediately diverted to extinguishment procedures, and the local Fire Department notified. The inside working face of all disposal areas will be maintained free and clear of debris to serve as a fire-break.

Daily cover of the waste is a major factor in the prevention of landfill fires; therefore, care will be taken to insure the adequate placement and compaction of the daily cover.

No open burning will be allowed on site.

All equipment-mounted fire extinguishers will be checked following every fire event and will be checked every 6 months for proper charge. The extinguishers will be recharged whenever a check indicates they are deficient.

Extinguishment of on-site fires will consist of smothering. Sufficient loads of cover material soil will be immediately placed upwind of the burning area. The soil will then be bladed (windrowed) onto the burning material combined with overhead deposition of cover soil from an elevated loader bucket. The on-site water truck may also be employed to provide a continuous water spray during smothering operations. The water truck will also be used in extinguishment of grass fires.

Any "hot loads" (collection vehicle carrying waste which has ignited) will be directed immediately into any open area, preferably an excavated area, away from any active working face. If it can be, the "hot load" will be discharged from the vehicle. All site operations will be immediately diverted to extinguishment of the burning load as specified above, using the smothering method, water spray and available fire extinguishers. In addition to extinguishment, site equipment will be deployed to immediately cut a fire break around the area of the burning load to prevent the spread of the fire.

In the event of any collection, hauling or operational vehicle fire on the site, the vehicle operator will leave the vehicle immediately, attempt to extinguish the fire with the equipment available fire extinguisher and notify the landfill manager. All site operations will be immediately diverted to fire extinguishment and confinement, using the smothering method, water spraying, fire extinguishers and fire break cutting.

The principal fire fighting material available on the site is soil to be used to smother any fires which might ignite. There is sufficient amounts of soil material available to extinguish on-site fires.

The secondary fire fighting material available on the site is water. Water to refill the water truck will be obtained from a hydrant of the City of Ponce municipal water system, located about 610 meters (2000 feet) southeast of the site entrance.

Chemical contents of the equipment-mounted fire extinguishers is the third fire fighting material available and is in sufficient quantities to extinguish minor equipment fires which may from time to time occur on the equipment due to overheating or equipment failure.

All personnel employed on the site will be proficient in extinguishment of landfill and equipment related fires. From time to time, additional instructions and classes will be provided by the site manager.

22. Employee Safety

The site will have a written safety policy manual to protect the health and welfare of site operational personnel as well as customers and visitors. Employees will be given periodic training in the safe operation of the landfill and the respective equipment.

All employees at the site will be provided with and instructed in the use of safety equipment. Landfill equipment will be fitted with roll-over protective cabs or canopies, fire extinguishers and backup warning systems. Normal safety precautions will be observed while around and operating the heavy equipment. Employees will be trained in first-aid techniques and a well-stocked kit will be kept at the site. Children accompanying adults to the site will remain in their vehicles at all times; this applies to all other persons not actively involved in vehicle unloading.

Accidents on-site will be investigated by the site manager and equipment operator or personnel involved. All accidents involving injury to personnel and/or vehicle and equipment damage will be investigated and a written report prepared by the site manager or safety manager and sent to the district manager within 5 days of the event. Accidents involving bodily injury and/or equipment damage serious enough to render the equipment inoperable, will be reported by telephone immediately to the district manager. First aid equipment is available on site. Should an injury require emergency care, the employee will be taken to a hospital or clinic immediately. Copies of each report will be maintained at the landfill site office.

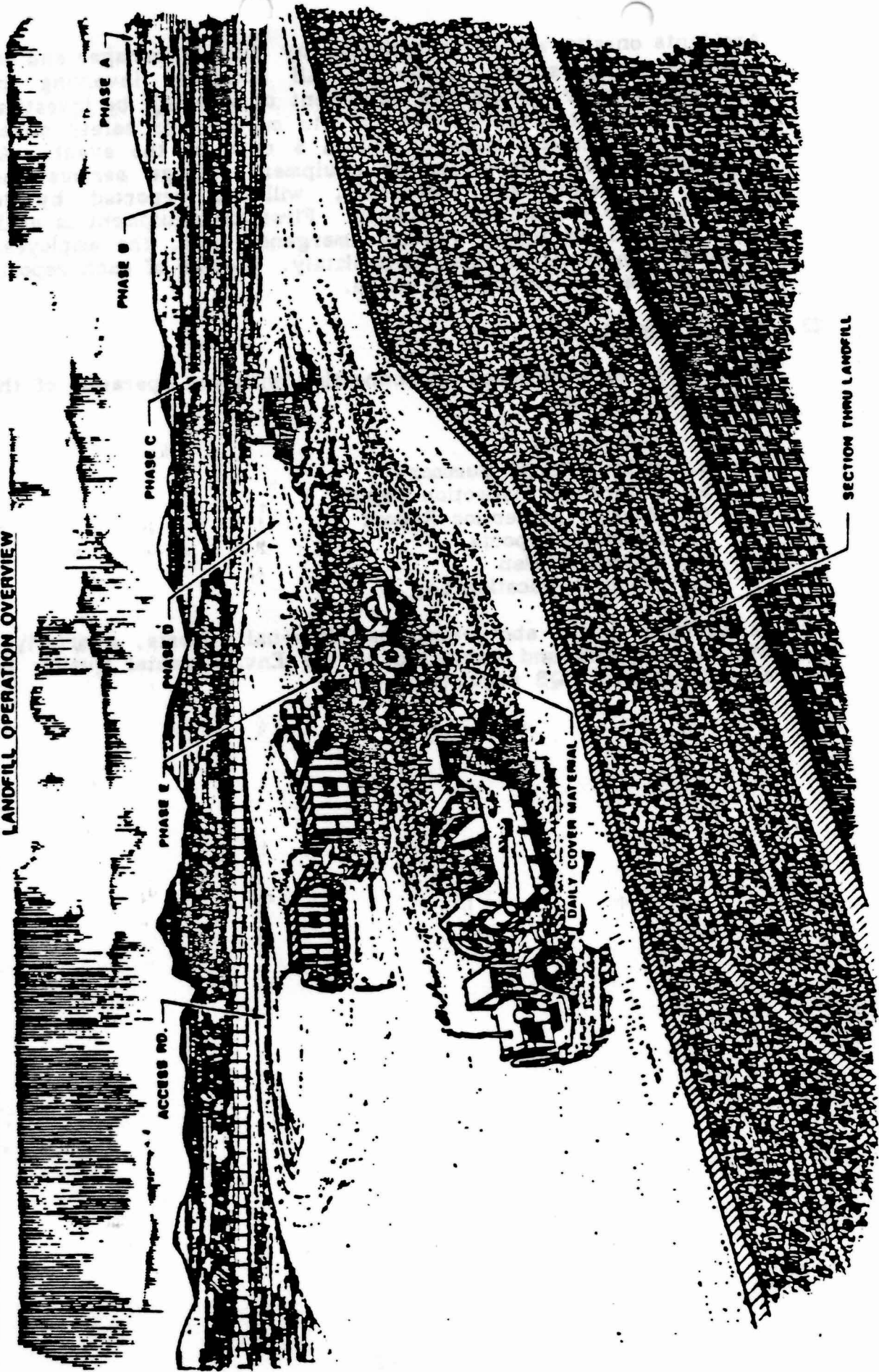
23. Record Keeping

Records to be maintained in connection with the operation of the Ponce landfill will include:

1. EQB Permit
2. Daily Activity Summary
3. Equipment Inspection Report
4. Monthly Inspection Report
5. Accident Reports
6. Operation Plan
7. Cover Application Log

In addition to the above-described internal reports, quarterly reports will be prepared and submitted to the Environmental Quality Board in accordance with EQB regulations.

LANDFILL OPERATION OVERVIEW



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ATTACHMENT 13

TRAINING FOR LANDFILL PERSONNEL

H. PERSONNEL TRAINING (40 CFR 270.14(b)(12), 264.16)

The site will be operating as a municipal landfill facility, accepting primarily municipal refuse and other non-hazardous wastes and prohibiting disposal of hazardous wastes.

BFIP will adhere to the site's current training program (Attachment 13) and to procedures for municipal landfills by local or future Subtitle D requirements. The current program includes training site personnel on the following topics:

- o Introduction to Landfill Operations;
- o Health Effects (Landfill);
- o Hazard Communication Training;
- o Labeling and Placarding of Hazardous Materials;
- o Hazardous Waste Identification and Response;
- o Basic Chemical Concepts;
- o Respirator/Protective Clothing;
- o Hearing Conservation;
- o Lifting and Your Back; and
- o Proper Backing Procedures.

In addition, presentations on first aid, fire prevention and fighting, and asbestos training are given to site personnel. The materials presented above are the basis for training during 1989. Training meetings are scheduled at approximately one month intervals.

Site personnel have not been trained in accordance with the requirements of 40 CFR 264 because they are not now, and have never been, involved in handling hazardous wastes.

TO : Rick Good
FROM : Carlos J. Cruz *CJC*
DATE : January 5, 1989
REF : TRAINING FOR LANDFILL PERSONNEL

=====

The following is a list of material used for training during 1989:

A. PROGRAMS

1. Introduction to Landfill Operations

This training program is a basic introduction to landfill operations for landfill equipment operators. Safe and efficient landfill operations are summarized in discussions relating to the following subjects:

- Personal Protective Equipment.
- Proper operating procedures.
- Regularly scheduled maintenance inspection of equipment.
- Dealing with special landfill problems such as foul weather, wire, bulky items, etc.
- How to handle different types of landfill fires.

2. Health Effects (Landfill)

Description of BFI's Occupational Health Program; specially for Medical Waste. Workplace exposure issues, including potential exposure to chemicals, radiation, and pathogens.

3. Hazard Communication Training

This program covers the fundamentals of recognizing and controlling potential hazards associated with chemicals and hazardous materials used on the job. Topics include the dangerous properties of chemicals the potential hazards involving chemical use, the methods of recognizing chemical hazards and control measures that can be applied to assure safe use. Also covered is a summary of the OSHA Hazard Communication Standard and state "Right-To-Know" laws.

9. Lifting and your back

Back-related injuries account for approximately 50% of all BFI personal injuries each year. But despite the frequency of this type of injury, most back injuries are preventable. This training program discusses many of the things employees do that have the potential for causing back problems. The program then goes on to suggest methods of job performance which can reduce the potential for work related back injuries.

10. Proper backing procedures

Backnig accidents are BFI's most frequently occurring vehicle accident. They account for approximately 30-35% of all vehicle accidents annually. These are many factors that contribute to backing accidents. This program discusses potential problems that can contribute to backing accidents, and then suggests proper operating procedures that can solve most of the problems.

B. PRESENTATIONS

- 1. First Aid (Dr. Bravo / N. Salls)**
- 2. Fire Prevention and Fighting (Ponce Fire Dept.)**
- 3. How to react during an official visit by a Government Regulatory Agency (C.Cruz)**
- 4. Asbestos Training (Protective equipment & proper handling procedures) (Sharetech, Inc.)**

These materials are the basis for training during this year and meetings are scheduled at approximately one month intervals.

4. Labeling and Placarding of Hazardous Material

Industrial requirements for Labeling and/or placarding of hazardous substance are explained in this presentation. Different sizes, shapes and colors used in the labels and their significance. Employees are trained to recognize and react to labels and placards.

5. Hazardous Waste Identification and Response

Every day our landfill employees are faced with potentially hazardous or questionable wastes. This program is designed to train our landfill employees in identifying hazardous waste; how to prevent this type of waste from entering BFI facilities; and how to deal with it if it does.

6. Basic Chemical Concepts

Elements of chemistry are discussed at landfill sites, their reactive nature and composition. Importance of waste recognition is presented to avoid reaction between waste.

7. Respirator/Protective Clothing

The use of appropriate personal protective equipment while on the job is essential, especially in potentially hazardous working environments. This program is designed to make employees aware of the dangers that may be present in their working environment; to describe appropriate personal protective equipment; and to outline BFI's procedures for use, handling and care of this equipment.

8. Hearing Conservation

Mowing the lawn, shooting firearms, and sandblasting are just a few examples of work we do that is high in noise. Exposure to excessive noise over many years can result in permanent hearing loss that cannot be corrected by a hearing aid or surgical means. This program covers how the human ear responds to noise and what BFI personnel can do to avoid noise-induced hearing loss.

9. Lifting and your back

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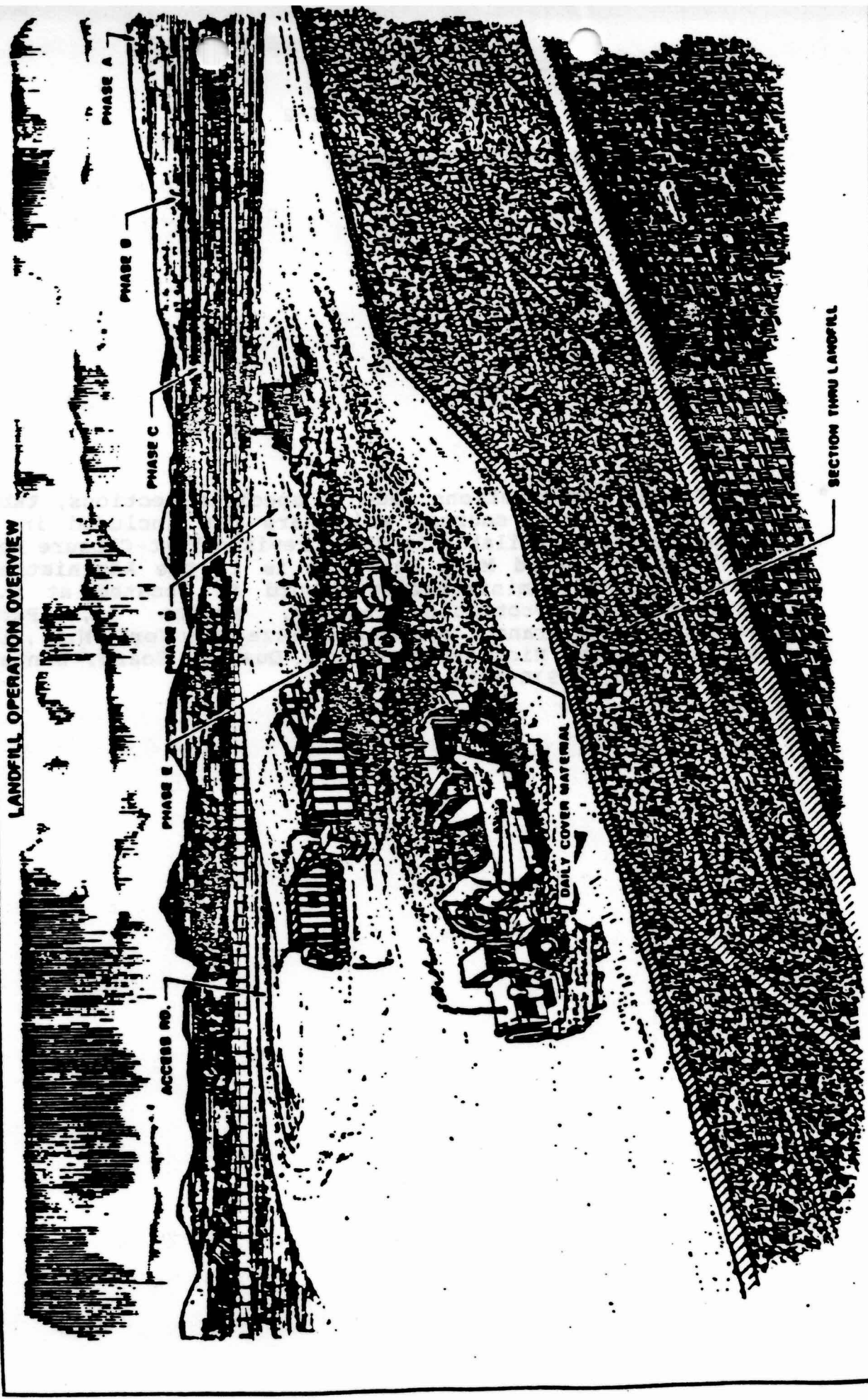
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LANDFILL OPERATION OVERVIEW



ATTACHMENT II-2

TRAINING

- * References and citations made to specific sections, tables, figures or other sources which are not included in this Attachment are available in BFI's revised Post-Closure Permit application, dated May, 1989 and is in the Administrative Record. The Administrative Record is located at U. S. Environmental Protection Agency, Region II, Permits Administration Branch, 26 Federal Plaza, New York, N.Y., 10278 and the Puerto Rico Environmental Quality Board, Santurce, Puerto Rico, 00910-1488.

G. CONTINGENCY PLAN (40 CFR 270.149(b)(7), 264.50 through 264.56, 264.52(b))

The site will be operating as a municipal landfill facility, accepting primarily municipal refuse and other non-hazardous wastes and prohibiting disposal of hazardous wastes. Therefore, the requirements of 40 CFR 264 concerning contingency plans at an operating hazardous waste facility are not applicable.

BFIP will adhere to the contingency procedures addressed in BFIP's Site Operation Plan (Attachment 12). These procedures include emergency procedures and a response plan in the event of a site fire or personnel injury. A communication network has been developed for site emergency situations and is comprised of a designated emergency coordinator and an alternate emergency coordinator. The emergency coordinators are familiar with on-site activities, emergency procedures and have the authority to commit the resources necessary to respond to the emergency situation. Off-site local fire, police and medical authorities are also listed in the plan, and will be contacted, if necessary, in the event of an emergency. In addition, the plan includes information on explosive gas monitoring, fire prevention and control, employee safety, litter control, dust control and vector control.

I.2 Post-Closure Plan (40 CFR 270.14(b)(13), 270.21(e),
264.118, 264.310(b))

I.2.1 General

BFIP plans to continue operating the municipal landfill during the RCRA post-closure period. The post-closure care is structured accordingly.

A final post-closure plan will be developed for the municipal landfill per future Subtitle D or other regulations applicable at the time.

I.2.2 Inspection and Maintenance Plan

The current site operational inspection and maintenance procedures will be adhered to during the RCRA post-closure period, as addressed in BFIP's Site Operation Plan (Attachment 12). Procedures to prevent hazards on-site and site contingency protocol, as described in Sections F and G, respectively, will also be adhered to during the RCRA post-closure period. In addition, the site will comply with any inspection and maintenance requirements of local and/or future Subtitle D regulations.

The groundwater monitoring system will be maintained in an operable condition through the post-closure period. Routine visual inspection of the monitoring wells will be conducted at a minimum during each sampling episode. The inspection will include an examination of the well, the protective casing and the locking cap for damage or indications of tampering. Any problems will be noted on the field sampling forms. Repairs will be made as necessary, and documented.

If at any time during monitoring, BFIP suspects tampering may have affected the chemistry of samples obtained from a well, BFIP reserves the right to re-sample and/or install another well adjacent to the suspect well. The data from re-sampling or from a new well will be used to evaluate whether tampering occurred.

Commencing in ¹⁹⁹⁰ 1989, and every five years thereafter, the integrity of the groundwater monitoring system will be examined. The examination will be certified by a professional engineer or a professional geologist. The examination will include the following:

1. Surveying all groundwater wells in the monitoring network (to be performed by a licensed professional surveyor) to establish the top of well casing elevations. This will be used to evaluate whether wells may have been tampered with or damaged.
2. Removal and inspection of any "dedicated" sampling device to determine whether the device is functioning as designed.
3. Sounding to the bottom of the well to check for the presence of sediments.
4. Performing an in-situ "slug" test as described in the Groundwater Monitoring Plan (Attachment 5). Comparing the test data to historic test data will indicate whether clogging of the screen or filter pack has occurred.

The results of the examination will be reported to the Agency within 60 days after completing the examination and any necessary remedial work will be documented.

If the first five year inspection of the monitoring wells indicates the need for more frequent inspections (or for less frequent inspections), the frequency of required inspections may be changed. Should BFIP personnel suspect that a well is no longer providing representative samples or accurate potentiometric values, or may be damaged in some way, BFIP will notify the Agency via telephone or letter within 7 days after learning that the well is suspect. A written remedial plan will subsequently be submitted to the Agency within 60 days after learning that the well is suspect. The plan shall include a proposal for rehabilitating the well, if it is possible, or for replacing the well. If BFIP is unable to obtain a representative sample from the well as a result of damage or problems with a well (or a sampling device within it), such information will be included in the plan to the Agency. Within 60 days after rehabilitation or replacement of the well, it will be sampled by BFIP.

BFIP must receive approval from the Agency before removing any well from service.

I.2.3 Monitoring Plan

Post-closure care will include groundwater monitoring as described in the site Groundwater Monitoring Plan (Attachment 5). As indicated in Section E, additional submittals are scheduled to fully define the groundwater monitoring plan. This plan will be adhered to during the post-closure period until the Agency and BFIP agree to allow groundwater monitoring to revert to the requirements of local or future Subtitle

D regulations. BFIP expects sufficient data on synthetic organic constituents to be available for this determination to be made after 2 years of monitoring.

I.2.4 Post-Closure Security

Access to the site will be controlled throughout the post-closure period. Unauthorized access will be prevented by a 2.1 m (7 foot) high chain link fence which surrounds the entire site. In addition, a guard will be stationed at the site entrance 24 hours a day.

I.2.5 Contact

Post-closure care will be conducted by BFIP. BFIP's contact person will be Mr. Richard Good, District Manager, who may be contacted during the post-closure period at his work telephone number (809/841-7770). Mr. Good's current home address and telephone number is:

Urb. Haciendas del Monte, D-5
Ponce, Puerto Rico 00732
(809) 848-3276

I.2.6 Post-Closure Certification

BFIP will maintain records that document the inspections called for in the post-closure plan and any maintenance activities that are required.

Within sixty days after completion of the post-closure period, BFIP will submit a certificate to the EPA stating that post-closure care has been completed in accordance with the approved post-closure plan. The certificate will be signed both by BFIP and an independent, registered, professional engineer. The engineer will supply information to the Agency explaining the basis for his certification and

indicating that documentation is available upon request. His certification may be based upon his personal knowledge, upon information provided by people under his supervision, or records supplied by BFIP.

I.3 Post-Closure Notices (40 CFR 270.14(b)(14), 264.119)

I.3.1 Notice to Local Zoning Authority

Within sixty days after completion of the post-closure period, BFIP will submit a summary of the information it has on the type and quantity of waste disposed in the landfill. This record will be filed with the Puerto Rican Land Use Authority and with the EPA.

I.3.2 Notice in Deed to Property

The property upon which the Ponce Municipal Landfill is located is not owned by BFIP. BFIP is only the operator of the site. As the operator of the site, BFIP cannot place a notice in the deed to this property as required by 40 CFR 270.14(b)(14). Only the Municipality of Ponce, owner of the facility, can place the required notice in the deed to this property.

I.4 Closure Cost Estimate (40 CFR 270.14(b)(15), 264.142)

The estimated cost for closing the Ponce Municipal Landfill Facility includes the costs of implementing the RFA work plans for sampling of cover soils and sampling soils beneath the landfill (Attachments 2 and 3) and reporting the results. This estimate represents the cost for closure of the facility under RCRA regulations.

The closure cost estimate is based on the costs of having a third party perform the closure activities. A breakdown of the estimated closure cost is provided below:

| <u>ITEM</u> | <u>ESTIMATED COST</u> |
|--------------------------------------|-----------------------|
| A. Cover Soil Sampling | \$ 68,500 |
| B. Soil Sampling Beneath Landfill | \$ 42,500 |
| C. RFA Report on Soils Investigation | \$ 25,000 |
| D. Closure Certification | \$ <u>10,000</u> |
| Subtotal | \$146,000 |
| plus 15% Contingency | \$ <u>21,900</u> |
| TOTAL | \$167,900 |

I.5 Financial Assurance Mechanism for Closure
(40 CFR 270.14(b)(15), 264.143)

(To be provided at a later date by BFIP)

I.6 Post-Closure Cost Estimate (40 CFR 270.14(b)(16),
264.144)

Included in the post-closure cost estimate are the estimated costs of the RFA hydrogeologic investigation described in Attachment 5, the estimated costs of setting up procedures for evaluating analytical data, the estimated cost for quarterly groundwater sampling and analysis for the first year after well installation, and semi-annual groundwater monitoring thereafter, for a 30 year post-closure period. The cost estimate also includes the replacement of six monitoring wells during post-closure. This post-closure cost estimate represents the costs involved to complete post-closure activities under RCRA regulations.

The post-closure cost estimate is based on the costs of having a third party perform the closure activities. A breakdown of the estimated post-closure cost is provided below:

| ITEM | ANNUALIZED COST | TOTAL COST |
|---|-----------------|-------------------|
| A. RFA Phase I Hydrogeologic Evaluation and Report | - | \$267,000 |
| B. Lysimeter Investigation | - | \$ 12,000 |
| C. Set-up Procedure for Data Evaluation | - | \$ 20,000 |
| D. First Year Groundwater Quarterly Sampling and Analysis | \$100,000 | \$100,000 |
| E. Detection Groundwater Monitoring Semi-annual Sampling and Analysis | \$32,000 | \$928,000 |
| F. Groundwater Data Review and Report | \$7,300 | \$219,000 |
| G. Inspections | \$1,200 | \$36,000 |
| H. Maintenance | \$2,000 | \$60,000 |
| I. Well Replacement | - | <u>\$222,000</u> |
| Subtotal | | \$ 1,864,000 |
| Plus 15% Contingency | | <u>\$ 280,000</u> |
| | TOTAL | \$ 2,144,000 |

I.7 Financial Assurance Mechanism for Post-Closure Care
(40 CFR 270.14(b)(16), 264.145)

(To be provided at a later date by BFIP)

I.8 Liability Requirements (40 CFR 270.14(b)(17), 264.147)

A copy of BFIP's Certificate of Insurance is included as Attachment 15.